

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEARNING ANNEX HOLDINGS, LLC,
LEARNING ANNEX, LLC, and
LEARNING ANNEX, L.P.,

Plaintiffs,

v.

RICH GLOBAL, LLC and
CASHFLOW TECHNOLOGIES, INC.,

Defendants.

09 Civ. 4432 (SAS) (GWG)

Learning Annex Updated Deposition Designations

Plaintiffs' Designation	Defendant's Objection	Defendant's Counter-Designation
Sharon Lechter (11/19/09)		
6:09-6:10		
7:20-8:03	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: promotional activities.	

9:06-10:04	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802).	
12:08 – 13:09	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	
18:24 – 19:22	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: promotional activities.	
23:25 – 24:20	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
32:06-32:23	Irrelevant (Fed. R. Evid. 401, 402).	
34:19-35:13	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	

37:01-39:07	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802).	
44:22-45:07	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: promotional activities.	
47:17 - 48:23	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404).	
49:15-50:4	Hearsay (Fed. R. Evid. 801, 802).	50:5-10
52:11-52:17	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	59:2-60:9; 103:13-105:5
53:16-55:09	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	59:2-60:9; 103:13-105:5
57:1-59:01		59:2-60:9; 103:13-105:5

63:04-63:11	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	59:2-60:9; 103:13-105:5
65:19-67:14	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
67:24-70:12	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
70:16-71:01	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
76:06-76:25	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	

77:01-80:01	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination and revenue split.	
83:15-85:14	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination and revenue split.	
87:14-88:02	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404), hearsay (Fed. R. Evid. 801, 802).	
93:01-93:07		
101:20-102:20	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	

111:20-24	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
113:22-114:9	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
111:20-114:20	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	
116:19-117:18	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.	